

Exhibit A

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

FELICIA SANDERS, individually and as)	
Legal Custodian of K.M., a minor,)	Civil Action No. 2:16-cv-2356-RMG
)	
Plaintiff,)	<i>consolidated with</i> 2:16-cv-2350; 2:16-cv-
)	2351; 2:16-cv-2352; 2:16-cv-2354; 2:16-cv-
v.)	2355; 2:16-cv-2357; 2:16-cv-2358; 2:16-cv-
)	2359; 2:16-cv-2360; 2:16-cv-2405; 2:16-cv-
THE UNITED STATES OF AMERICA,)	2406; 2:16-cv-2407; 2:16-cv-2409; and
)	2:16-cv-2746
Defendant.)	

This document pertains to all cases

AFFIDAVIT

Personally appeared before me David Price, who being duly sworn deposes and says

Attached is a copy of my resume. In my work to determine vocational opportunities in South Carolina I have determined numerous private companies that perform background checks in South Carolina which include such services as criminal history (felonies and misdemeanors) checks, sex offender registration checks, financial and legal work checks, work status/employment history checks, business partner checks, financial and legal issue checks, education verification checks, social security verification checks, credit reports, civil issues, license verification, driving history and address and verification. These companies utilize computer resources and South Carolina private investigators. Services are directed primarily toward pre-employment background checks but may be tailored to the specific needs of the company.

Again, these companies are private entities which perform work in South Carolina.



David Price

SWORN to and SUBSCRIBED before me

this 29th day of January, 2020.


[Signature]

Notary Public for South Carolina

My commission expires: June 26, 2027

CURRICULUM VITA

RELATED WORK:

April 21, 2006 through present
Charleston, SC

Vocational & Occupational Counseling Services, LLC- Self-employed vocational consultant.

1986 through 2007

South Carolina- US Department of Labor, Office of Worker's Compensation Claims: provide vocational rehabilitation services to injured federal employees living in SC

May 1984-April 1985, June 1986-April 21, 2006
Charleston, SC

Intracorp- Medical case management services, vocational assessments, developed and implemented vocational rehabilitation plans, labor market surveys and expert witness testimony on worker's compensation claims and disability claims.

May 1985-May 1986
Moncks Corner, SC

Berkeley Industries, SC Department of Mental Health: Job placement and job procurement for handicapped and disabled adults.

October 1977-September 1982
Ridgeville, SC

S.C. Department of Corrections- Vocational Counselor: Testing and evaluation, academic and vocational counseling, placement services.

EXPERIENCE:

Testing and evaluation, counseling, development of vocational rehabilitation plans, on-the-job training, academic retraining programs, job placement, job procurement, disability assessment, medical case management, Longshore & Harbor Workers Act, Federal Employees Compensation Act, US Department of Labor, Office of Worker's Compensation Programs. Expert Witness testimony: SC Worker's Compensation Commission, Social Security Administration, state and federal court.

EDUCATION:

Clemson University

Master of Education: Personnel Services/Vocational Counseling, 1977

Charleston Southern University

Bachelors of Science, Psychology, 1973

PROFESSIONAL CERTIFICATIONS:

Commission on Rehabilitation Counselor Certification- Certified Rehabilitation Counselor (CRC)